

Appl. No. 10/036,801
Amdt. dated June 23, 2006
Reply to Office Action of February 1, 2006

Remarks

The present amendment responds to the Official Action dated February 1, 2006. A petition for a two month extension of the time to respond and authorization to charge Deposit Account No. 50-1058 the \$450.00 large entity fee for this extension accompany this amendment. The Official Action rejected claims 1 and 2 under 35 U.S.C. 102(b) as anticipated by Cross and Monaghan "Redesigning the Process," Mortgage Banking Dec 1996; 57,3; pp. 36-43 ("Cross"). The Official Action rejected claims 6, 7, 16 and 17 under 35 U.S.C. 103(a) as unpatentable over Cross. The Official Action rejected claims 3-5 and 8-15 under 35 U.S.C. 103(a) as unpatentable over Cross in view of Kettinger, Teng, and Guha, "Business Process Change: A Study of Methodologies, Techniques and Tools", MIS Quarterly, March 1997; 21,1; pp. 55-80 ("Kettinger"). These grounds of rejection are addressed below following a brief discussion of the present invention to provide context. Claims 1, 3, 11, and 16 have been amended to be more clear and distinct. Claims 1-17 are presently pending.

The Present Invention

A process according to an aspect of the present invention comprises creating an inventory of touchpoints, which are points at which exchanges of data or information occur during the execution of tasks by the organization. Touchpoints may include exchanges of data or information between the organization and a customer and exchanges of data or information between elements of the organization. Projects may be suitably identified based on the inventory of touchpoints, and validated and prioritized based on their impact on customer requirements and

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the financial impact of the touchpoints on the organization. Projects are executed and increases in productivity and customer satisfaction are measured.

The Art Rejections

All of the art rejections hinge on the application of Cross, standing alone or in combination with Kettinger. As addressed in greater detail below, Cross and Kettinger do not support the Official Action's reading of them and the rejections based thereupon should be reconsidered and withdrawn. Further, the Applicants do not acquiesce in the analysis of Cross and Kettinger made by the Official Action and respectfully traverse the Official Action's analysis underlying its rejections.

Claims 1 and 2

The Official Action rejected claims 1 and 2 under 35 U.S.C. 102(b) based on Cross. In light of the present amendment to claim 1, this ground of rejection is respectfully traversed.

Claim 1, as amended, claims identifying and making an inventory of touchpoints comprising instances of exchange of information between an organization and customers of the organization, and instances of exchange of information within the organization. Claim 1 further claims identifying projects, based upon the inventory of touchpoints; validating and prioritizing projects based on an analysis of customers' critical requirements and overall financial impact on the business organization; executing the prioritized projects; and measuring increases in productivity and customer satisfaction. These limitations in the claimed combination are not taught by Cross.

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Cross teaches techniques for redesign of a mortgage production process. Cross establishes goals in the form of operating targets, assesses the current situation, and develops solutions in light of the current situation and the operating targets. The assessment of the current situation includes mapping the activities performed in a loan approval process. Assessment of the current situation by Cross also includes identifying points of customer contact, identifying cross-functional handoffs, identifying feedback loops, identifying cycle times, and identifying numbers of file copies made.

Cross does not teach building an inventory of touchpoints comprising instances of exchange of information between elements within the organization, and does not teach identification of projects based upon the inventory of touchpoints. Cross does not teach cataloging each instance of an exchange of information between elements within the organization. Instead, Cross investigates particular ways in which information may be managed and activities accomplished in order to determine if obstructions to efficient exchange of information are present. However, Cross' discussion does not contemplate the possibility of an inventory of instances of exchanges of information within the organization and examination of these instances to identify opportunities for improvement. For example, the steps "Identify cross-functional handoffs" discussed at Cross, p. 40, first column, lines 4-22, and "Identify feedback loops" discussed at Cross, p. 40, first column, line 23 through Cross, p. 40, second column, line 6, involve the identification of specific types of information exchange that may involve obstructions or inefficiencies. However, these activities do not appear to involve examination of each instance of information exchange within the organization, but instead focus

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on a more general level of examination of activities to determine if the activities fall into particular categories. Identification of activities as falling into these categories alerts the organization that attention should be focused on these activities to allow for improvements in efficiency and customer satisfaction. However, instances of information exchange may be missed if they do not fall into one of the categories. The categories are essentially created at the beginning of the examination, based on estimates of the types of activities that may advantageously be examined in order to improve efficiency. However, such categories may not be comprehensive and may not include every instance of information exchange that may advantageously be examined. Building an inventory including each instance of information exchange within an organization, as well as between the organization and a customer, and identifying projects based on such an inventory, as claimed by claim 1, provides rigor in identifying obstructions and inefficiencies, and provides for a comprehensive examination. By identifying and examining an inventory of instances of information exchange, it is more certain that an organization can identify obstructions and inefficiencies affecting each individual instance, and combinations of such instances, if such obstructions and inefficiencies exist. It replaces human guesswork as to where problems are foreseen or foreseeable with an automated system for tracking where problems actually exist in execution. Claim 1, as amended, therefore defines over the cited art and should be allowed.

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Claims 6, 7, 16 and 17

The Official Action rejected claims 6, 7, 16 and 17 under 35 U.S.C. 103(a) as unpatentable over Cross. Claims 6 and 7 are dependent claims having claim 1 as a base claim. Because claim 1 has been shown to be allowable, claims 6 and 7 should also be allowed.

With respect to claims 16 and 17, in light of the present amendment to claim 16, the rejection of claims 16 and 17 is respectfully traversed.

Claim 16, as amended, claims an electronic database, accessible by a server computer, containing data relating to projects that have been identified by identifying and cataloguing touchpoints comprising instances of exchange of information between an organization and customers of the organization, and instances of exchange of information within the organization. These limitations in the claimed combination are not taught or made obvious by Cross. As noted above with respect to claim 1, Cross does not teach identifying projects by identifying and cataloguing touchpoints comprising instances of exchange of information between an organization and customers of the organization, and instances of exchange of information within the organization. Claim 16, as amended, therefore defines over the cited art and should be allowed.

Claims 3-5 and 8-15

The Official Action rejected claims 3-5 and 8-15 under 35 U.S.C. 103(a) as unpatentable over Cross in view of Kettinger. Claims 3-5 and 8-10 are dependent claims having claim 1 as a base claim. Because claims 3-5 have been shown to be allowable, claims 3-5 and 8-10 should also be allowed.

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With respect to claims 11-15, in light of the present amendment to claim 11, the rejection of claims 11-15 is respectfully traversed. Claim 11, as amended, claims identifying and making an inventory of touchpoints comprising instances of exchange of information between the organization and customers of the organization, and instances of exchange of information within the organization. Claim 11 further claims identifying projects, based upon the inventory of touchpoints, to increase business productivity and customer satisfaction by eliminating or redesigning identified touchpoints. Claim 11 further claims validating and prioritizing projects based upon an analysis of customers' critical requirements and overall financial impact on the business organization, rigorously executing the prioritized projects, and measuring increases in productivity and customer satisfaction. These limitations in the claimed combination are not taught or made obvious by Cross, Kettinger, or a combination thereof. As noted above with respect to claims 1 and 16, Cross does not teach identifying projects by identifying and cataloguing touchpoints comprising instances of exchange of information between an organization and customers of the organization, and instances of exchange of information within the organization. Adding Kettinger to Cross does not cure Cross's deficiencies as a reference with respect to claim 11, as amended. Kettinger provides a survey of commonly used business process reengineering techniques and tools and provides methods of analysis for evaluating and choosing techniques and tools in light of the needs of any particular project. Kettinger does not teach or make obvious the creation of an inventory of touchpoints including exchanges of information within an organization and identification of projects based on the inventory of

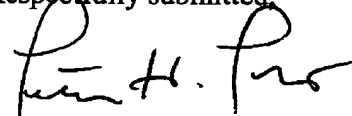
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touchpoints, as claimed by claim 11. Claim 11, as amended, therefore defines over the cited art and should be allowed.

Conclusion

All of the presently pending claims, as amended, appearing to define over the applied references, withdrawal of the present rejection and prompt allowance are requested.

Respectfully submitted,



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